

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

19-cv-10796

v.

INTERNATIONAL INVESTMENT GROUP, LLC,

Defendant,

TURNOVER ORDER

WHEREAS on November 21, 2019, the SEC filed a complaint against International Investment Group, LLC (“IIG”) for violations of Section 17(a)(1), (2), and (3) of the Securities Act of 1933 [15 U.S.C. § 77q(a)(1), (2), and (3)], Section 10(b) of the Exchange Act of 1934 [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5], pursuant to Section 20(e) of the Exchange Act [15 U.S.C. § 78t(e)] and Sections 206(1) and 206(2) of the Advisers Act of 1940 [15 U.S.C. § 80b-6(1), (2)];

WHEREAS IIG consented to a Judgment and asset freeze order (“Judgment and Freeze”), which the Court entered on November 26, 2019;

WHEREAS because of the Judgment and Freeze, financial institutions including Citibank N.A. secured IIG’s accounts;

WHEREAS on March 30, 2020, the Court entered a Final Judgment and ordered IIG to pay \$35 million in disgorgement and prejudgment interest;

WHEREAS IIG continues to owe the SEC approximately \$35 million;

WHEREAS Citibank has identified an IIG Capital account not referenced in the Final Judgment. The IIG Capital escrow account *3142 (“Escrow Account”), holds approximately \$767,000, which Citibank secured due to the Court’s Order. The Escrow Account serves as a control account with three “client” accounts: New Millenium FSG LTD (account *7706), Lami Trading Company (account *0637), and YN Corp (account *9597);

WHEREAS facts and circumstances demonstrating IIG’s fraud and IIG’s dominance over IIG Capital exist. These include that IIG and IIG Capital shared at least one address: 1500 Broadway, Floor 26, New York, New York 10036; Defendants Silver and Hu were managing partners of both entities; IIG Capital received \$78,000 from the IIG Trade Opportunities Fund – one of the funds IIG managed; and one IIG Capital sub-account disbursed funds to Hu’s wife on multiple occasions;

WHEREAS the Escrow Account funds have been secured since 2019 and no one has emerged to claim the funds;

WHEREAS Citi believes the Order applies to the Escrow Account;

WHERAS on these facts, the equities warrant turnover of the Escrow Account to the SEC;

THEREFORE, IT IS HEREBY ORDERED that Citi turnover the proceeds of the IIG Capital Escrow account *3142 to the SEC electronically, for which the Commission will provide detailed ACH transfer/Fedwire instructions upon request, or by payment via cashier’s check or certified check to the SEC at the following address:

Enterprise Services Center
Accounts Receivable Branch
6500 South MacArthur Boulevard
Oklahoma City, OK 73169

for an anticipated distribution to IIG's Victims if feasible.

Dated: New York, New York
August 14, 2024

A handwritten signature in black ink, appearing to read "Dennis Cole". The signature is written in a cursive, somewhat stylized font. The first name "Dennis" is written with a large, looped 'D' and the last name "Cole" is written with a large, looped 'C'.

UNITED STATES DISTRICT COURT JUDGE